

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM
CHAPTER 127 INSPECTION REPORT

PERMIT NO: 36-3033
DATE PREPARED: 2-10-03
BY: T. L. Rainar *TLR*
E-FACTS I.D.: 1200209

1. OWNER OF SOURCE
Bulova Technologies, L.L.C.

2. LOCATION OF SOURCE
Site: 101 N. Queen St.
Munic.: Lancaster City
County: Lancaster

3. SOURCE & AIR CLEANING DEVICE
Source: Plating and Finishing
Area
A/C Device: Heil Packed Tower
Scrubber

4. OFFICIAL (CONTACTED):
Name: Mr. Robin E. Thomas
Title: Director Environmental
Compliance
Name: Mr. Rick Daniels
Title: Manager Maintenance

(MAIL TO): Mr. Robin E. Thomas
Title: Director Environmental
Compliance
Address: P. O. Box 4787
City, State: Lancaster, PA 17604-4787

5. WAS EQUIPMENT OPERATIONAL ? Yes WAS INSPECTION ANNOUNCED? No

6. PRODUCTION/FIRING RATE: Average production in all Departments

7. MAXIMUM PRODUCTION/FIRING RATE INFORMATION: Same

8. OPERATING PARAMETERS: Water flow to scrubber: Scrubber not operating
pH: (see remarks)
Valve on pump:
Line pressure: psi
Caustic solution: NaOH

9. AVERAGE STACK OPACITY: 0 % MALODORS: None FUGITIVE: None

10. APPLICATION CONFORMANCE: No STANDARDS COMPLIANCE: No (see remarks)

11. MALFUNCTIONS SINCE LAST INSPECTION (If yes, explain in remarks) Yes

12. REMARKS: The scrubber controls three areas each with numerous pick-up points. The three areas are the Chem Lab, the Finishing/Plating area and the Technical Products area. The majority of the pick-up points are for plating operations which include nickel, chromate, copper, and zinc lines. A small amount of precious metal plating is conducted in the Lab.

RECOMMENDATIONS *DMB*

Issue Operating Permit
Reissue Operating Permit
Issue Temporary Permit
Reissue Temporary Permit
Deny Operating Permit
X Reinspection Only
Other: SOP - NM

DATE INSPECTED: 01/15/03
VALID UNTIL: 05/31/06

REMARKS: (continued)

The SOP - NM Permit was issued on 5-23-01 with an effective date of 6-1-01. This permit expires on 5-31-06.

The Detrex Conveyorized Degreaser covered by Operating Permit No. 36-327-011A was taken out of service in 1995.

An additional Soldering Operation was installed as part of Circuit Board Assembly Production in April 2001. This installation was granted a Minor Significance Determination on 2-2-01.

The following sources are listed on the Natural Minor application:

- 101 Metal Finishing Processes
- 102 Conformal Coating
- 103 Small Scale Cleaning
- 104 Soldering Operations
- 105 Lubricating Processes
- 106 Packaging/Stenciling/Etc.
- 107 Sealing/Gluing/Bonding
- 108 Potting/Encapsulation

All of the above sources exhaust to the Heil Packed Tower Scrubber. The Conformal Coating Operation is also equipped with Dry Panel Filters which in turn vent to the Scrubber.

During this inspection the writer discovered that the Recirculating pump for the scrubber solution was not in operation. The induced draft fan was operating and there was adequate ventilation at all source pick-up points. After checking with Rick Daniels, Manager Maintenance, Mr. Thomas reported the following day that the Scrubber Pump had been de-activated on 12-7-02 due to a structural failure of the Mist Eliminator. Due to freezing temperatures this malfunction led to ice build-up on the fan and surrounding roof. Refer to letters from Mr. Thomas and Mr. Daniels for more information.

Mr. Thomas was advised that not operating the scrubber as designed constitutes a violation of Permit Condition B.7.(b). of the recently issued SOP - NM permit and therefore Section 127.444. He reported that since the original installation many of the operations have been outsourced and downsized and the scrubber may not be needed at all. The writer advised him to submit a Request for Permit Determination to Engineering Services.

REMARKS: (continued)

A Notice Of Violation will be prepared. This notice will include a request that the company, in lieu of an air pollution control plan, submit a Request for Permit Determination Form to Engineering Services within 30 days. Following receipt of this information, an analysis of the emission rate during this malfunction can be completed and enforcement options discussed.

cc: Southcentral Region